

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division

In re:

Grecian Willette Thrias Standley

Chapter 13

Case No. 20-71174-FJS

Debtor

RESPONSE TO DEBTOR’S MOTION TO SELL REAL PROPERTY

NOW COMES, PNC Bank, National Association, by and through counsel (“Respondent”), files its Response to Debtor’s Motion to Sell Real Property located at 6424 Aberdeen Place, Suffolk, VA 23435 (“Motion to Sell”) and as reasons respectfully represents as follows:

1. Respondent is a Secured Creditor which holds a first lien on the above referenced real property.
2. On or about April 6, 2020, Grecian Willette Thrias Standley (“Debtor”) filed a Voluntary Petition in this Court under Chapter 13 of the United States Bankruptcy Code.
3. On or about December 7, 2021, the Debtor filed their Motion to Sell.
4. Respondent does not object to the sale on the condition that the lien is paid in full, subject to a proper payoff quote from Respondent, which will be sent to Debtor’s counsel upon request.

WHEREFORE, Respondent, requests the Debtor's Motion to Sell be granted.

Date: December 21, 2021

Respectfully submitted,

/s/Daniel K. Eisenhauer

Daniel K. Eisenhauer, Bar #85242

Orlans PC

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CERTIFICATE OF SERVICE

The undersigned states that on December 21, 2021, copies of the foregoing Response to Debtor's Motion to Sell Real Property were filed with the Clerk of the Court using the ECF system, which will send notification of such filing to the following:

Michael P. Cotter
870 Greenbrier Circle, Suite 402
Chesapeake, VA 23320
mpcotter@mpcch13.com
Bankruptcy Trustee

John Russell Bollinger
Lorin D. Hay
Kathryne Mary Rose Shaw
Boleman Law Firm, P.C.
Convergence Center III
272 Bendix Road, Suite 330
Virginia Beach, VA 23452
ecf@bolemanlaw.com
Debtor's Attorney

and I hereby certify that I have caused to be mailed by first class mail, postage prepaid, copies of the foregoing Response to Debtor's Motion to Sell Real Property to the following non-ECF participants:

Grecian Willette Thrias Standley
6424 Aberdeen Place
Suffolk, VA 23435
Debtor

Christopher D. Standley
6424 Aberdeen Place
Suffolk, VA 23435
Co-Debtor

/s/Daniel K. Eisenhauer
Daniel K. Eisenhauer, Esquire